

No. 22-324

IN THE
Supreme Court of the United States

MICHELLE O'CONNOR-RATCLIFF AND T.J. ZANE,

Petitioners,

v.

CHRISTOPHER GARNIER AND KIMBERLY GARNIER,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Manhattan Institute as Amicus Curiae contains 7,307 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

Executed on August 14, 2023.



CHRISTOPHER P. SCHANDEVEL
ALLIANCE DEFENDING FREEDOM
44180 Riverside Parkway
Lansdowne, VA 20176
(571) 707-4655
cschandavel@ADFlegal.org